

Eric A. Liepins
ERIC A. LIEPINS, P.C.
12770 Coit Road
Suite 1100
Dallas, Texas 75251
Ph. (972) 991-5591
Fax (972) 991-5788

PROPOSED ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

IN RE §
ODES INDUSTRIES, LLC § Case No. 19-43582
DEBTOR §

MOTION TO SELL PROPERTY OF THE ESTATE

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Odes Industries, LLC (“Dignity”), Debtor in the above styled and numbered cause and files this its Motion to Sell Property of the Estate (“Motion”) and would respectfully show unto the Court as follows:

1. This Court has jurisdiction over this proceeding and the parties and property affected hereby pursuant to 28 U.S.C. §§1334 and 157. Consideration of the Emergency Motion constitutes a core proceeding as defined in 28 U.S.C. §157(b)(2)(A), (K), (M) and (O).
2. The Debtor commenced this proceeding on August 31, 2019 by filing a voluntary petition under Chapter 11 of the United States Bankruptcy Code. Since the filing of the petition, the Debtor has remained in possession of its assets and continued in

operation of its business as a debtor-in-possession pursuant to 11 U.S.C. §§1107 and 1108.

3. The Debtor's business consists of selling and repairs of all terrain vehicles.
4. The Debtor has received an offer to purchase certain assets of the Debtor including part, equipment and intellectual property ("Property") from Massimo Motor Sports, LLC ("Massimo"). A true and correct copy of the Contract is attached as Exhibit A.
5. The purchase price is \$500,000.
6. The Debtor believes this to be a fair offer subject to higher and better bids for the Property.
6. The Debtor would request that court authorize the Debtor to the Property free and clear of all liens claims and encumbrances and allow the liens against the Property to attach to the proceeds of the sale.
7. Debtors would request that the Court allow the Debtors to sell the Property free and clear of all liens claims and encumbrances and that the net sales proceeds be placed into the Debtor in Possession account with all liens attaching to the proceeds and not to be distributed without further order of this Court.

WHEREFORE, PREMISES CONSIDERED, the Debtor would request this matter be set down for an Hearing and that upon hearing, this Court enter and Order authorizing the Debtor's Sale of the Property, and for such other and further relief as the Debtor may show itself justly entitled.

Respectfully submitted,

Eric A. Liepins
Eric A. Liepins, P.C.
12770 Coit Road
Suite 1100

Dallas, Texas 75251
(972) 991-5591
(972) 991-5788 - telecopier

By: /s/ Eric Liepins
Eric A. Liepins, SBN 12338110
PROPOSED ATTORNEY FOR DEBTOR

Certificate of Service

I hereby certify that a true and correct copy of the foregoing Motion was sent via mail to all creditors of the estate on this the 12th day of February 2020.

/s/ Eric Liepins
Eric A. Liepins